

From: [Gayoso, Jose](#)
To: akatten@crlaf.org
Cc: [Arrington, Linda](#); [Motilall, Christina](#)
Subject: RE: Recommendations on prioritizing additional information on label to translate to Spanish
Date: Friday, June 05, 2015 2:19:52 PM

Hi Anne,

Thank you and the rest of the group for your comments and suggestions. I have some questions/comments;

- 1) Could you please clarify what sections in the first 8 pages of the label you think would be helpful to provide translations? It seems to me like most of the language is directed at efficacy and preventing damage to the crops, not necessarily the safety of the handler.
- 2) Engineering Controls language is a good suggestion, but I would need to find out how much variability there can be in that section. If there is a lot of variability, it would be difficult to provide a translation guide. I will find out.
- 3) Mixing instructions can vary widely among pesticide products. Do you have a suggestion as to how EPA would facilitate the translation of these sections?
- 4) If we agreed to your suggestions and decided to add more sections to the translation guide, there is the potential that the pilot could be delayed even further. We have already done a lot of outreach to the states and registrants on the current state of the pilot. While we might be able to include a little more language in the translation guide, any major changes would require additional outreach and feedback, which could take a long time. That's why we want to be very careful about any changes to the pilot, and want our translation guide to focus on human safety language.

I have another comment that is not specifically about your suggestions, but is related. On the conference call, I believe it was Eve that asked if EPA would or could, as part of the pilot, suggest that companies submit for domestic registration any export labels already translated to Spanish. It was a good question but I did not have a good answer. I think I can answer it now.

I think that EPA could make that suggestion, but not as part of the pilot. The pilot is focused on bilingual **EPA approved (i.e., stamped) labels**. Right now, any company can sell their pesticide products with bilingual labeling, as long as the English portion has been stamped approved by EPA. However, this translation is optional and the company can also sell this product with just English on the label. However, if a pesticide label is EPA approved **with** bilingual language, then all products sold would need to match the EPA approved label, including the Spanish portions. This is true also for "distributor products," which are sub-registrations of EPA approved labels. Since distributor products have to match the EPA approved label, they would also have the Spanish portions (distributor products can omit certain claims from the EPA approved labels, such as application site or pest, but they cannot change the precautionary language <http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-9-supplemental-distribution-registered#requirements>).

The challenge of EPA approving a bilingual label is that a full label review of each and every word in both languages would have to be performed. I don't think its impossible, but it would be challenging

given that every registration team does not have a Spanish literate Product Manager.

So, in summary, the focus of the pilot is to have EPA approved labels with bilingual portions of the most critical safety language. However, outside of the pilot, per se, it would be great if more companies would sell full bilingual versions of their pesticides in the market, and perhaps we can encourage them to do so.

I'm sorry that was long, but I hope it clarified some things. We can discuss this on the next call if necessary.

I look forward to your responses to my questions at the top of this email.

Best regards,
Jose

José Gayoso, Chemical Review Manager
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Pesticide Re-evaluation Division
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From: Anne Katten [mailto:akatten@crlaf.org]
Sent: Friday, June 05, 2015 1:14 PM
To: Arrington, Linda; Gayoso, Jose; Motilall, Christina
Subject: Fwd: Recommendations on prioritizing additional information on label to translate to Spanish

The label is attached to this email!

----- Forwarded message -----

From: **Anne Katten** <akatten@crlaf.org>
Date: Fri, Jun 5, 2015 at 10:08 AM
Subject: Recommendations on prioritizing additional information on label to translate to Spanish
To: Arrington.Linda@epa.gov, Gayoso.Jose@epa.gov, "Motilall, Christina" <Motilall.Christina@epa.gov>

TO: Linda Arrington, Jose Gayoso and Christina Motilall,
USEPA Risk Management and Implementation Branch.

FROM: Anne Katten (CRLAF), Jeannie Economos (FWAF), Amy Liebman (MCN), Marco Salerno (CATA), Virginia Ruiz (FJ), Eve Gartner and Claire Vallin (EJ)

Linda, Jose and Christina,

Thank you for taking the time to discuss the bilingual labeling pilot program on May 27th. We appreciate the update but remain very concerned about the long delay in starting the bilingual label pilot and encourage the agency to make use of existing translations of labels to help speed up this work. In particular, the safety instruction information which has been translated on many international labels and labels of pesticides sold in big box stores should be utilized as much as possible.

As we discussed on the call, we think it would be valuable to translate a greater portion of the information on use instructions and REIs on the label and recommend that one way to limit the amount translated is to translate all or most of the general use instructions but only the REI boxes in the crop specific portion of the label.

For example, in the attached Lorsban label, general use instructions are contained in the first 8 pages of the 29 page label with REI information in boxes under each crop and a final Storage and Disposal box at the end of the label.

It is very important to translate the general user instructions on engineering controls and user safety recommendations as well as the boxes with REI information and the Storage and Disposal box.

In addition, it would be valuable to translate the general use instructions, particularly the Spray Drift Management and Orchard Air-blast Best Management Practices. Translation of aerial application directions is probably not as important though some workers who assist with aerial applications need bilingual label information.

Please contact us if you have any further questions. We look forward to receiving the doodle for the next call soon.

Anne

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Anne Katten

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